

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CANON, INC.,

Plaintiff,

vs.

TCL ELECTRONICS HOLDINGS LTD.,
TCL CORPORATION,
SHENZHEN NEW TECHNOLOGIES CO.
LTD.,
TCL KING ELECTRICAL APPLIANCE
(HUIZHOU) CO. LTD.,
TCL KING ELECTRONICS (CHENGDU)
CO., LTD.,
TCL KING ELECTRICAL APPLIANCES
(NANCHANG) CO., LTD.,
TCL TONGLI ELECTRONICS (HUIZHOU)
CO., LTD., and
TONLY ELECTRONICS HOLDINGS LTD.

Defendants.

No. 2:18-cv-00546

Jury Trial Demanded

**DECLARATION OF ANDREW T. RADSCH IN SUPPORT OF
DEFENDANTS' MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Andrew Radsch, declare as follows:

1. I am a partner at the law firm of Ropes & Gray LLP. Ropes & Gray LLP is counsel for all defendants in this action. I submit this declaration in support of Defendants' Motion to Transfer Venue to the Northern District of California.

2. Attached hereto as Exhibit 1 is a true and correct copy of a TiVo Corporation webpage titled "History," available at <https://www.tivo.com/history> (last accessed Sept. 12, 2019).

3. Attached hereto as Exhibit 2 is a true and correct copy of an article by Mark Fischetti, *The Future of TV*, MIT TECH. REVIEW (Nov. 1, 2001), available at <https://www.technologyreview.com/s/401240/the-future-of-tv/> (last accessed Sept. 12, 2019).

4. Attached hereto as Exhibit 3 is a true and correct copy of an article by May Wong, *DirecTV Buys DVR Software Maker ReplayTV*, FOX NEWS (Dec. 15, 2007), available at https://www.foxnews.com/printer_friendly_wires/2007Dec15/0,4675,DirecTVReplayTVaquisition,00.html (last accessed Sept. 12, 2019).

5. Attached hereto as Exhibit 4 is a true and correct copy of the LinkedIn biography of Brian Lanier, available at <https://www.linkedin.com/in/brianlanier/> (last accessed Sept. 12, 2019).

6. Attached hereto as Exhibit 5 is a true and correct copy of a webpage titled "Moxi Media Center" (May 3, 2004), available at <http://informitv.com/2004/05/03/moxi-media-center/> (last accessed Sept. 12, 2019).

7. Attached hereto as Exhibit 6 is a true and correct copy of the ZoomInfo page for Steve Perlman, available at <https://www.zoominfo.com/p/Steve-Perlman/609014> (last accessed Sept. 12, 2019).

8. Attached hereto as Exhibit 7 is a true and correct copy of a Rearden Companies webpage titled “People,” available at <http://www.rearden.com/people.php> (last accessed Sept. 12, 2019).

9. Attached hereto as Exhibit 8 is a true and correct copy of the LinkedIn biography of Roger van der Laan, available at <https://www.linkedin.com/in/roger-van-der-laan-a15279> (last accessed Sept. 12, 2019).

10. Attached hereto as Exhibit 9 is a true and correct copy of an article by Kyle Russell, *Meet the Geniuses Making Your Cell Phone Internet 1,000x Faster than 4G*, BUSINESS INSIDER (Mar. 16, 2014), available at <https://www.businessinsider.com/meet-artemis-the-company-behind-pcell-2014-3> (last accessed Sept. 12, 2019).

11. Attached hereto as Exhibit 10 is a true and correct copy of a curriculum vitae of Robert E. Novak, former VP of Technology at Digeo.

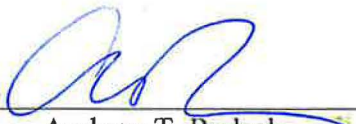
12. Attached hereto as Exhibit 11 is a true and correct copy of a list of issued U.S. patents on which Robert E. Novak is a listed inventor.

13. Attached hereto as Exhibit 12 is a true and correct copy of a table comparing the flight times from Tokyo, Osaka, Beijing, Shenzhen, and Shanghai to San Francisco and Dallas, as obtained from the Flight Time Calculator (available at <https://flighttime-calculator.com>) on Sept. 5, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of a table measuring the distances from Corona, CA to San Francisco, CA and Marshall, TX, as obtained from the Distance Calculator (available at <https://www.distancecalculator.net/>) on Sept. 8, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2019.

/s/ 
Andrew T. Radsch